



"I will stand for my client's rights.  
I am a trial lawyer."  
—Ron Motley (1944–2013)

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November 3, 2023

**VIA ECF**

Hon. Richard Mark Gergel  
U.S. District Court for the District of South Carolina  
J. Waite Waring Judicial Center  
83 Meeting Street  
Charleston, South Carolina 29401

Re: *In re AFFF Products Liability Litigation*, MDL No. 2:18-mn-2873-RMG

Dear Judge Gergel:

As the Court may recall, during the October 31, 2023 Case Management Conference, the parties informed Your Honor that they may need an extension from the current November 1, 2023 deadline to submit a proposed plan for the depositions in Tier Two fact discovery permitted under CMO 27 (the Telomer AFFF Bellwether Plan).

The parties have met and conferred and jointly respectfully request an extension to provide the proposed deposition plan to the Court on or before November 21, 2023. This date aligns with the deadline by which the parties will present their agreed upon, or competing, Tier Two case proposals. This extension is requested because the parties will be in a better position to make a well-informed and efficient deposition plan at the end of Tier One Discovery.

We thank the Court for its continued time and courtesies.

Respectfully submitted,

Fred Thompson, III  
*Plaintiffs' Liaison Counsel*

Encl.

cc: All Counsel of Record (by ECF)  
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